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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARINA CORONA,

Plaintiff,

v.

VZL STAFFING SERVICES, LLC,

Defendant.

Case No.: 3:25-cv-00072-ART-CLB

**STIPULATION TO CONTINUE
EARLY NEUTRAL EVALUATION
CONFERENCE**

(First Request)

Defendant VZL STAFFING SERVICES, LLC (“Defendant” or “VZL”), by and through its counsel of record, the law firm of Jackson Lewis P.C., and Plaintiff MARINA CORONA (“Plaintiff”), by and through her counsel of record, the law firm of Mark Mausert Law Office, hereby stipulate and agree to continue the Early Neutral Evaluation Session currently scheduled for June 17, 2025, at 9:00 a.m. with Magistrate Judge Craig S. Denney based on the following:

1. On February 6, 2025, Plaintiff initiated this action against Verano Nevada, LLC d/b/a Zen Leaf Reno (“Verano Nevada”). ECF No. 1.

2. On February 20, 2025, Plaintiff filed a First Amended Complaint. ECF No. 4.

1 3. On April 2, 2025, the Court issued an Order Setting Early Neutral Evaluation
2 Session for June 17, 2025, at 9:00 a.m. with Magistrate Judge Craig S. Denney, in person, in Reno,
3 Nevada. ECF No. 13.

4 4. April 29, 2025, Plaintiff served her First Set of Interrogatories and First Set of
5 Requests for Production on Verano Nevada.

6 5. On May 5, 2025, the Parties stipulated to allow Plaintiff to file a Second Amended
7 Complaint which dismissed Verano Nevada and named her correct employer, VZL Staffing
8 Services, LLC, which the Court granted. ECF Nos. 19 and 20.

9 6. On May 19, 2025, Counsel for VZL provided Plaintiff's Counsel with an executed
10 Waiver of Service pursuant to FRCP 4(d), noting the initial request for waiver was made on April
11 29, 2025. As such, Defendant VZL's response to the Second Amended Complaint is due by June
12 29, 2025.

13 7. On May 29, 2025, the Parties agreed that Defendant VZL would have until June 27,
14 2025, to respond to Plaintiff's First Set of Interrogatories and First Set of Requests for Production.

15 8. Subsequently, Plaintiff's Counsel experienced a sewer leak that has delayed
16 completion of Plaintiff's Confidential Early Neutral Evaluation Statement.

17 9. Further, Defendant's representative for the ENE, who is in-house counsel, has
18 learned that he has to appear for a virtual hearing on June 17, 2025, the current date of the ENE, in
19 the Circuit Court of Cook County at 11:00 a.m. and which is expected to last until 12:00 p.m.
20 However, depending on the Circuit Court's calendar that day, it could take several hours for the
21 hearing to be called and completed.

22 10. Counsel for the Parties have discussed the foregoing circumstances and determined
23 that the ENE should be continued to ensure the best environment for settlement discussions
24 including that Defendant's response to the Second Amended Complaint be on file, that Plaintiff has
25 Defendant's responses to her written discovery requests, and the Parties' representatives and
26 Counsel are not potentially distracted by extraneous matters.

11. Accordingly, the Parties request that the Court vacate the current ENE date of June 17, 2025, and allow the Parties to work with the Court's Judicial Assistant to identify a new date that works for the Court, the Parties, and their representatives, to hold the continued ENE.

12. Further, unless otherwise ordered by the Court, the Parties' respective Confidential ENE Statements shall be delivered to the Clerk's Office, in an envelope clearly marked "Confidential, contains ENE Evaluation Statement, in accordance with LR 16-6(f).

13. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation and Order shall be construed as an admission of or consent to the merit or validity of any claim, defense, objection, or right by any party in this case.

DATED this 10th day of June, 2025.

DATED this 10th day of June, 2025.

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ORDER

IT IS SO ORDERED.


 HON. CRAIG S. DENNEY
 UNITED STATES MAGISTRATE JUDGE

Dated: June 10, 2025